

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE, **JUDGE'S COPY**

Plaintiff,

VS.

KENNETH D. KYLER, et al.,

Defendants.

**FILED**  
**HARRISBURG**

JUN 27 2001

MARY E. DIANDREA, CLERK

Per gls  
DEPUTY CLERK

AFFIDAVIT OF INMATE NORMAN JOHNSTON

I, Norman Johnston, #44- / declare & affirm  
penalty of perjury & pursuant to 28 U.S.C. § 1746, that  
following facts are true & correct based upon my knowledge  
Information And Belief =

1. That, during the months of ~~December~~ ~~and~~ December, ~~and~~ January, 2000, I was confined in the RHU at SCI-Camp Hill.

2. That, Inmate John Richard Jae was ~~in~~ ~~the~~ ~~camp~~ ~~at~~ ~~SCI-Camp Hill~~ ~~in~~ ~~November~~ ~~and~~ ~~December~~ ~~1999~~ ~~and~~ ~~January~~ ~~2000~~.

3. That, In November & December, 1999, and in January, 2000, Superintendent Kenneth D. Kyler, Deputy Superintendent for Facility Management and RHU Lieutenant/Unit Manager William J. [unclear] at SCI-Camp Hill did not allow RHU Inmates to have their own personal softcover law books and religious books other than a Bible or Quran in their RHU cells and that John Richard Jae was not permitted to have his own personal softcover law books and religious books in his RHU cell. In November or December, 1999, nor in January, 2000, John Richard Jae did not have the opportunity to obtain religious books from his stored property in his RHU cell.

4. That, in April & May, 2000, I was confined in the RHU at SCI-Camp Hill and John Richard Jae was confined in the RHU at SCI-Camp Hill & I caused a few cells down from me.

5. That, in April & May, 2000, I ~~was~~ personally with the officers Rubendall and Rager, the SCI-Camp Hill RHU property officers Jerry Rubin Richard Jae, his legal and the legal materials.

6. That, the RHU officers had developed an ongoing practice of denying RHU inmates showers & outside exercise, in May & December 1999, & also had developed practices of placing plexiglass slats down over RHU inmates' cell doors when they talked to loud back in November & December, 1999, and that Superintendent Kyle, Deputy Superintendent Forgo, the management Palakovich and RHU Lieutenant/Unit Manager Rhoades were all aware of such and failed to do anything about such.

7. That, it was excessively hot in the RHU at SCI in November & December, 1999, and there was a problem with the heating system in the RHU in November & December, 1999.

(S)

MR. NORMAN J. JONES

Attorney  
at Law